

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re: Equifax, Inc. Customer Data Security Breach Litigation	MDL Docket No. 2800 No. 1:17-md-2800-TWT This document relates to: <i>City of Chicago v. Equifax Inc.</i> , No. 1:18-cv-1470
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JOINT MOTION TO SET DEADLINES

Pursuant to Section 3 of Case Management Order No. 5 (“CMO-5,” Dkt. 409), Defendant Equifax Inc. (“Equifax”) and Plaintiff City of Chicago (“Chicago”) respectfully request that the Court set deadlines with respect to Chicago’s filing of an amended complaint and briefing on Equifax’s motion to dismiss the amended complaint, showing the Court as follows:

1. On January 7, 2020, Chicago filed a motion requesting that the Court set a status conference “to determine next steps with respect to the City’s claims in this litigation, in light of the Court’s December 19, 2019 ruling granting final approval of the Consumer Plaintiffs’ class action settlement.” Dkt. 955.

2. Chicago’s motion states that because it “is not pursuing claims on behalf of its residents (i.e., consumer plaintiffs), but rather, seeks relief on behalf of the City itself,” proceeding with the adjudication of the City’s claims is appropriate

at this time. *Id.* at 2. The motion also suggests that the Court “set[] a deadline for Equifax to answer or otherwise respond to the City’s complaint.” *Id.* at 4.

3. Counsel for Equifax and Chicago have conferred regarding Chicago’s motion, and have agreed to jointly propose a schedule for Chicago to file an amended complaint and for Equifax to file a motion to dismiss the amended complaint.

4. Accordingly, the parties jointly request the entry of an order setting forth the following deadlines:

- a. Chicago shall file an amended complaint by February 19, 2020;
- b. Equifax shall file its motion to dismiss the amended complaint by March 20, 2020;
- c. Chicago shall file a response to Equifax’s motion to dismiss by April 10, 2020; and
- d. Equifax shall file a reply in support of its motion to dismiss by April 24, 2020.

5. If the Court approves of the proposed schedule, the parties agree that a status conference will not be required at this time.

WHEREFORE, the parties respectfully request that the Court enter an order setting forth the jointly proposed schedule outlined above. A proposed order is attached for the Court’s consideration.

Respectfully submitted this 22nd day of January, 2020.

/s/ David L. Balser

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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by Local Rule 5.1B. This brief was prepared on a computer using the Times New Roman font (14 point).

DATED: January 22, 2020

/s/ David L. Balser
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CERTIFICATE OF SERVICE

I hereby certify that on January 22, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ David L. Balser
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